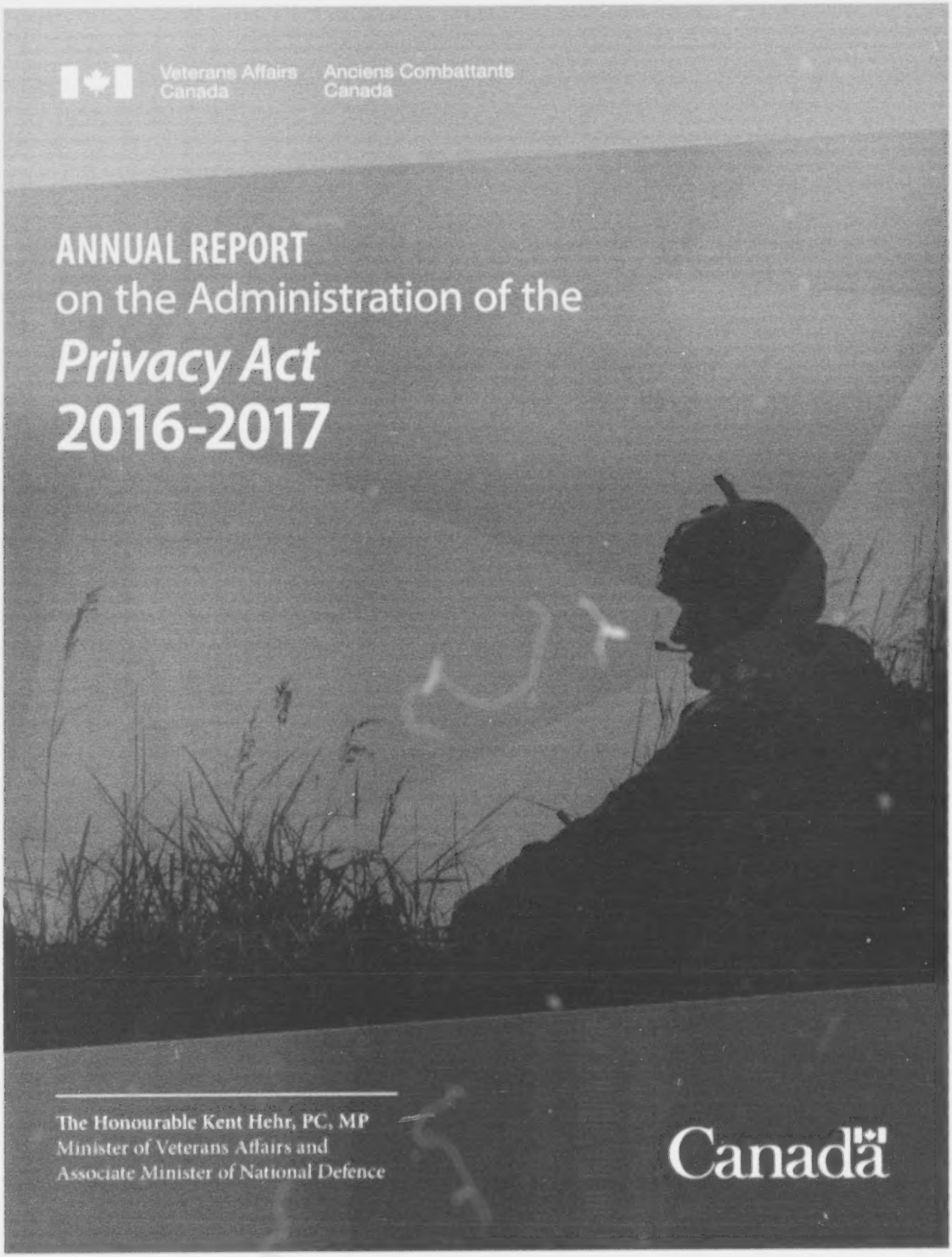
Veterans Affairs Canada | Anciens Combattants Canada

ANNUAL REPORT
on the Administration of the
Privacy Act
2016-2017



The Honourable Kent Hehr, PC, MP
Minister of Veterans Affairs and
Associate Minister of National Defence

Canada

Table of Contents

Table of Contents 1

1. Introduction 3
2. Mandate of Veterans Affairs Canada 3
3. Mandate of the Office of the Veterans Ombudsman 4
4. Organization 5
   - I Veterans Affairs Canada Access to Information and Privacy Office 5
   - II Office of the Veterans Ombudsman Access to Information and Privacy Unit 5
5. Delegation Order 6
6. Highlights of the Statistical Report, 2016-17 7
   - I Requests under the *Privacy Act* 7
   - II Disposition of Requests Completed 8
   - III Completion Time 9
   - IV Exemptions Cited 10
   - V Exclusions Cited 11
   - VI Translation 11
   - VIII Corrections and Notations 11
   - IX Extensions 12
   - X Consultations 12
   - XI Costs 12
7. Training and Awareness 13
8. Policies, Guidelines, Procedures and Initiatives 14
9. Summary of Key Issues and Actions Taken on Complaints and Audits 15
10. Monitoring Compliance 15
    - I Veterans Affairs Canada 15
    - II Office of the Veterans Ombudsman 16
11. Material Privacy Breaches 16
    - I Veterans Affairs Canada 16
    - II Office of the Veterans Ombudsman 17
12. Privacy Impact Assessment 17
13. Public Interest Disclosures 22

Annex 1: VAC and OVO Delegation Order – *Privacy Act* and Privacy Regulations 23

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO) 26
Annex 3: Statistical Report on the *Privacy Act* (OVO) 34
Annex 4: Five-Year Statistical Analysis (VAC and OVO) 42
Annex 5: Definitions of Dispositions 43

1. Introduction

The *Privacy Act* provides Canadians citizens and permanent residents with the right of access to, and correction of, personal information about themselves that is under the control of a federal government institution. Under the *Privacy Act*, "personal information" is defined as "information about an identifiable individual that is recorded in any form." Examples include information about national or ethnic origin, colour, religion, age or marital status of an individual; education or medical, criminal, financial or employment history of an individual; address, fingerprints or blood type of an individual; and, any identifying number, symbol or other particular identifier assigned to an individual.

The *Act* also provides the framework for the collection, accuracy, use, disclosure, retention and disposition of personal information.

Veterans Affairs Canada (VAC) and the Office of the Veterans Ombudsman (OVO) take very seriously the responsibility to protect the privacy and rights of all Veterans and their families.

This annual report on the administration of the *Privacy Act* outlines how VAC and the OVO fulfilled their responsibilities under the *Privacy Act* during the fiscal year beginning April 1, 2016 and ending March 31, 2017. This report is prepared and tabled in Parliament in accordance with section 72 of the *Privacy Act*.

2. Mandate of Veterans Affairs Canada

Canada's development as an independent country with a unique identity stems partly from its proud military achievements. VAC exists to help those whose courageous efforts gave us this legacy and contributed to Canada's growth as a nation.

VAC's mandate is set out in the *Department of Veterans Affairs Act*. It charges the Minister of Veterans Affairs with responsibility for *"...the care, treatment or re-establishment in civil life of any person who served in the Canadian Forces or Merchant Navy or in the naval, army, air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated . . . and the care of the dependents or survivors of any person referred to..."* VAC is also responsible for keeping alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

Responsibilities

VAC fulfills its mandate by enabling the well-being of Veterans and their families, and by supporting recognition and remembrance of the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

This is accomplished by:

- Providing leadership as a champion of Veterans, and by promoting the strategic alignment and coordination of benefits and services; whether available through the Department and other federal partners, or through provincial and community programs and non-government organizations;
- The work and research of the Department—listening to the suggestions of Veterans, their representatives, and stakeholders. The Department strives to design and deliver programs that meet the modern needs of Veterans and their families; and,
- Helping Veterans access the supports and services they need, from all levels of government and the community. Veterans Affairs Canada aims to be a leader in the care and support for all Veterans and their families.

3. Mandate of the Office of the Veterans Ombudsman

The OVO helps ensure that the sacrifices of Canada's Veterans and their families are recognized through the provision of services, benefits, and support in a fair, accessible, and timely manner. As an impartial and independent officer, the Veterans Ombudsman reports directly to the Minister of Veterans Affairs and works to ensure that Veterans, men and women of the Canadian Armed Forces (CAF), members and former members of the Royal Canadian Mounted Police (RCMP), as well as their families and other individuals that are clients of VAC are treated fairly and in accordance with the *Veterans Bill of Rights*.

The mandate of the Ombudsman, found in the *Order-in-Council P.C. 2007-530*, is to

- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives arising from the application of the provisions of the *Veterans Bill of Rights;*
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served (by VAC);
- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including individual decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;
- Review systemic issues related to the Veterans Review and Appeal Board; and,
- Facilitate stakeholders' access to programs and services by providing them with information and referrals.

4. Organization

I Veterans Affairs Canada Access to Information and Privacy Office

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister of Veterans Affairs and the Deputy Minister to ensure that the Department fulfills its responsibilities under the *Access to Information Act* and the *Privacy Act*. The ATIP Coordinator reports to the Director General of Information Technology, Information Management, Administration and Privacy, which is part of the Chief Financial Officer and Corporate Services Branch.

The main activities of VAC's ATIP Office include:

- Processing requests for information submitted under the *Access to Information Act* and the *Privacy Act,* including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing policies, procedures and guidelines in support of Access to Information and Privacy legislation and central agency requirements;
- Providing awareness and training on access to information and privacy to ensure employees understand their roles and responsibilities;
- Monitoring compliance with both acts, regulations and central agency requirements;
- Preparing annual reports to Parliament on the administration of the *Acts;*
- Leading the development of Privacy Impact Assessments (PIAs);
- Acting as point of contact to resolve complaints against VAC which have been submitted to the Information Commissioner of Canada and to the Privacy Commissioner;
- Providing centralized management of privacy breaches;
- Providing VAC staff with advice, guidance and training on ATIP issues;
- Analyzing and responding to privacy and access to information policy issues;
- Reviewing new forms for the collection of personal information;
- Developing appropriate Privacy Notice Statements; and,
- Evaluating contracts and Memoranda of Understanding.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office is comprised of two teams: Operations, and Policy and Governance. In 2016–2017, the VAC ATIP Office employed a total of 28.4 full-time equivalents (FTEs).

II Office of the Veterans Ombudsman Access to Information and Privacy Unit

The Veterans Ombudsman, Deputy Ombudsman and Executive Director (formerly Director General of Operations in Delegation Order in Annex 1), Legal Advisor, and Director, Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties and functions of the Minister as the Head of Veterans Affairs, under the provisions of the

Acts and related regulations (see Annex 1). Although four positions have been delegated full authority, the Director, Corporate Services and Charlottetown Operations, is responsible for management of the Access to Information and Privacy function within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both Acts are met. Processing of requests is centralized within the unit. The unit consists of the Director, Corporate Services and Charlottetown Operations, and the Information Management Coordinator. These two full-time staff members were assigned to the administration of both *Acts* on a part-time (as required) basis during the 2016–2017 reporting period, which represents 0.16 of a FTE.

The main activities of the OVO ATIP Unit include:

- Processing OVO requests for information submitted under the *Access to Information Act* and the *Privacy Act,* including consulting with other federal departments and third parties with respect to ATIP requests received;
- Developing OVO policies, procedures, guidelines, and processes in support of Access to Information and Privacy legislation and central agency requirements;
- Providing awareness and training on access to information and privacy to ensure OVO employees understand their roles and responsibilities;
- Monitoring OVO compliance with both acts, regulations and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament on the administration of the *Acts;*
- Completing and coordinating the completion of Privacy Impact Assessments (PIAs) for the OVO;
- Working closely with VAC for the resolution of any complaints against OVO which have been submitted to the Information Commissioner of Canada and the Privacy Commissioner of Canada;
- Providing centralized management of privacy breaches within the OVO;
- Providing advice and guidance to OVO staff on ATIP issues;
- Analyzing and responding to OVO privacy and access to information policy issues;
- Reviewing new OVO forms for the collection of personal information;
- Developing appropriate Privacy Notice Statements for the OVO; and,
- Evaluating contracts and Memoranda of Understanding.

5. Delegation Order

The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental and OVO officials through a delegation order (attached as Annex 1).

6. Highlights of the Statistical Report, 2016-17

The following summary provides an overview of key statistics on the administration of the *Privacy Act* at VAC and the OVO between April 1, 2016, and March 31, 2017. A more detailed breakdown can be found in Annex 2 (VAC and OVO Statistical Report) and a separate interpretation specific to the OVO in Annex 3 (OVO Statistical Report).

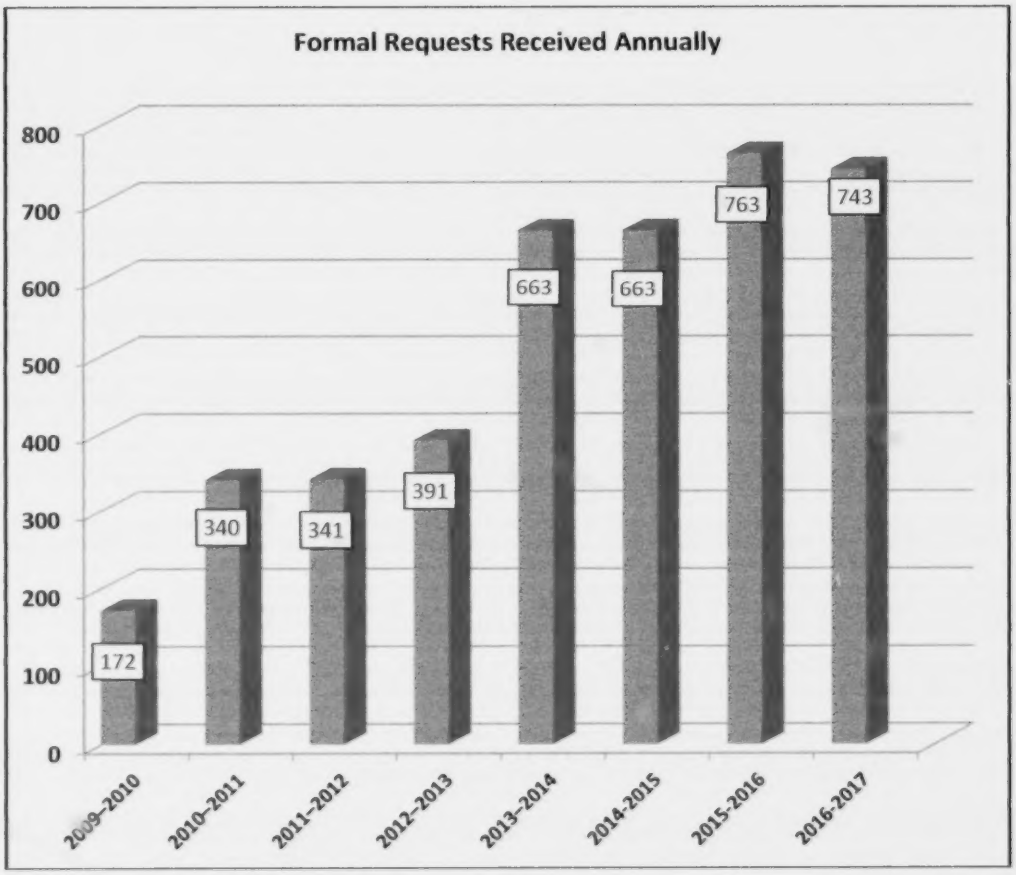
I Requests under the *Privacy Act*

A formal request is a written request made under the *Privacy Act* to the government institution that controls the record. The Department has 30 calendar days to respond. There are limited situations where extensions are permitted. If an extension is required, requestors are notified in writing.

Between April 1, 2016 and March 31, 2017, the Department received 743 formal requests for information under the *Privacy Act* (737 by VAC and 6 by the OVO). This represents a small decrease (2.6% or 20 requests) overall for the Department (see Annex 4 for a five-year comparison), but an increase for OVO, since it received no requests in 2015–2016. There is a trend toward more complex, high volume privacy requests. The number of consultations required from other government institutions decreased from 98 in 2015-2016 to 41 in 2016-2017. The reason for the decrease is due to new agreements with partner departments, such as the Department of National Defence, about what information requires consultation and what can be done within the VAC ATIP Office.

VAC continues to see a decline in the number of informal privacy requests since the Department treats the majority of requests formally. An informal request is a request for information that is not made or processed under the *Act* (e.g., the request is not submitted formally via the online portal or on Personal Information Requests Form, or neither piece of legislation has been noted in the request). In 2016-2017, VAC processed 13 informal requests compared to approximately 10 in 2015-2016.

No informal requests were received by the OVO during the 2016-2017 reporting period.



On April 1, 2016, VAC carried forward 86 open formal requests (86 for VAC and none for the OVO) from the previous year. Combined with the 743 requests (737 for VAC and 6 for the OVO) received in 2016–2017, a total of 829 requests (823 for VAC and 6 for the OVO) were active during the 2016–2017 fiscal year.

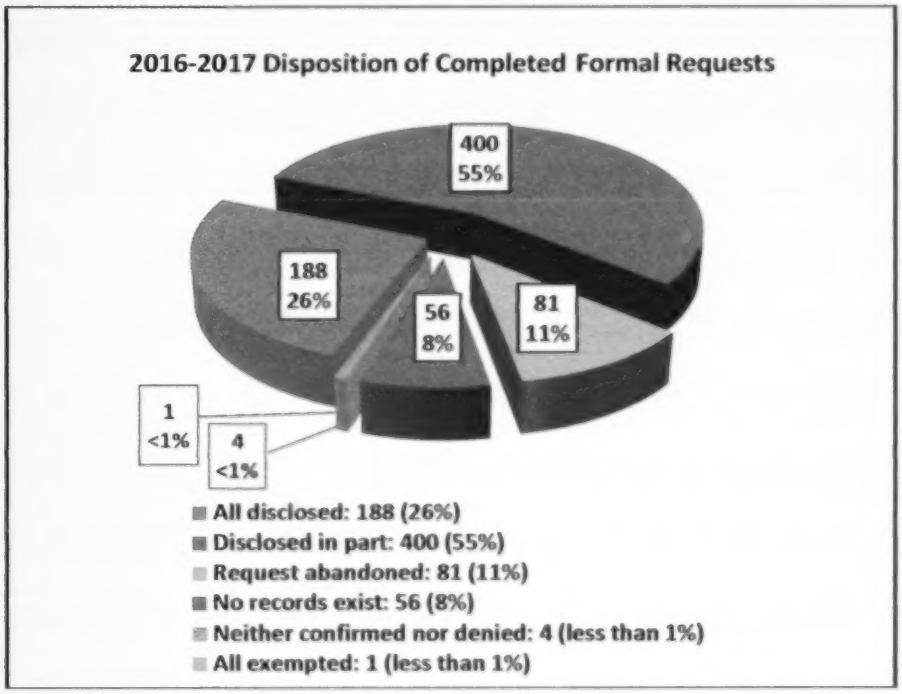
The Department completed 730 formal requests during the reporting period (724 by VAC and 6 by the OVO). At the end of the fiscal year, VAC carried 99 outstanding formal requests (99 for VAC and none for the OVO) forward to the 2017–2018 fiscal year.

II Disposition of Requests Completed

In total, 730 formal requests (724 for VAC and 6 for the OVO) were completed during the 2016–2017 fiscal year compared with 757 requests completed by VAC (757 for VAC and none for the OVO) in the previous year. During the reporting period, VAC processed 183,978 pages and disclosed 176,755 pages, while the OVO processed 1,244 pages and disclosed 714 pages. In total, VAC and the OVO processed 185,222 pages and disclosed 177,469 pages in 2016-2017. This is a 10% decrease in pages processed and an 11% decrease in pages disclosed, compared to the 2015–2016 fiscal year (206,582 pages processed; 198,889 pages disclosed). The reason

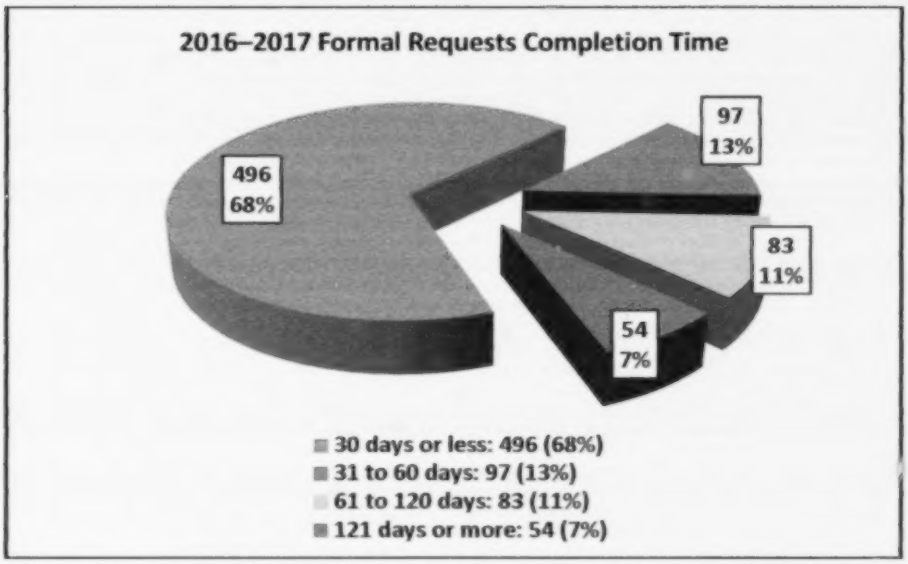
for the decrease in pages processed was attributed to complex requests, high volume cases and workload.

The disposition of the 730 requests (724 for VAC and 6 for the OVO) completed in 2016–2017 is illustrated in the following chart:



III Completion Time

Of the 730 requests completed, 490 VAC requests and all 6 OVO requests were completed within the legislated time frame. During the 2016–2017 reporting period, 68% of the formal requests were completed in 30 days or less; 13% were completed within 31 to 60 days; 11% were completed within 61 to 120 days; and, 7% of the requests requiring additional time and effort were completed in 121 days or more. The reason for the completion times was attributed to complex requests, high volume cases and workload.



IV Exemptions Cited

Canadians have a right of access to their personal information. The *Privacy Act*, however, identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the *Act* that authorizes the head of the government institution to not disclose personal information in response to a privacy request. The Department invoked 409 exemptions[1] (407 by VAC and two by the OVO) under Sections 21, 22, 26, 27 and 28 of the *Privacy Act*. The most frequently applied exemption was Section 26, which permits for the refusal to disclose information that relates to any individual other than the individual who made the request. This exemption ensures that the personal information of anyone, other than the requester, is protected.

The following table identifies the number of requests where specific types of exemptions were applied for VAC and the OVO:

[1] For statistical purposes, an exemption is counted only once when it is applied to a file multiple times.

Exemptions cited	2014-2015	2015-2016	2016-2017
Paragraph 19(1)(*a*) (Information obtained in confidence)	1	0	0
Section 21 (International affairs and defence)	1	4	1
Paragraph 22(1)(*a*)(i) (Law enforcement and investigation)	0	0	1
Paragraph 22(1)(*a*)(ii) (Law enforcement and investigation)	1	0	1
Paragraph 22(1)(*b*) (Law enforcement and investigation)	1	2	1
Section 25 (Safety of individuals)	3	0	0
Section 26 (Information about another individual)	484	388	398
Section 27 (Solicitor-client privilege)	9	7	3
Section 28 (Medical record)	8	7	4
Total exemptions cited	**508**	**408**	**409**

V Exclusions Cited

Sections 69 and 70 of the *Privacy Act* set out exclusions. An exclusion is information to which the *Act* does not apply. Examples include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen's Privy Council for Canada. During this reporting period, there were no exclusions (VAC or OVO) under Sections 69 and 70.

VI Translation

Neither VAC nor the OVO received any privacy requests requiring translation during the 2016-2017 reporting period. In comparison, VAC received five privacy requests requiring translation during the 2015-2016 reporting period. The OVO did not receive any privacy requests during the 2015-2016 reporting period.

VIII Corrections and Notations

Under the *Privacy* Act, individuals are entitled to request correction and notation of personal information when they believe there is an error or omission. VAC received one request for correction, which was actioned as a partial correction and partial notation in 2016–2017. No requests for corrections and notations were received by the OVO in 2016-2017. Similarly, VAC also received one request for correction (none for the OVO) during the 2015-2016 reporting period. No corrections (VAC or OVO) have been carried forward to the 2017–2018 fiscal year.

IX Extensions

During the reporting period, a total of 16 requests were extended by VAC and none by the OVO. These extensions were due to consultation with other institutions. All 16 extensions were between 16 to 30 days in length.

X Consultations

VAC received and closed four requests for consultations from other government institutions or organizations during the 2016–2017 reporting period. No consultations were carried forward into the 2017–2018 fiscal year.

OVO received no requests for consultations from other government institutions and organizations during the 2016-2017 reporting period. No consultations were carried forward into the 2017-2018 fiscal year.

XI Costs

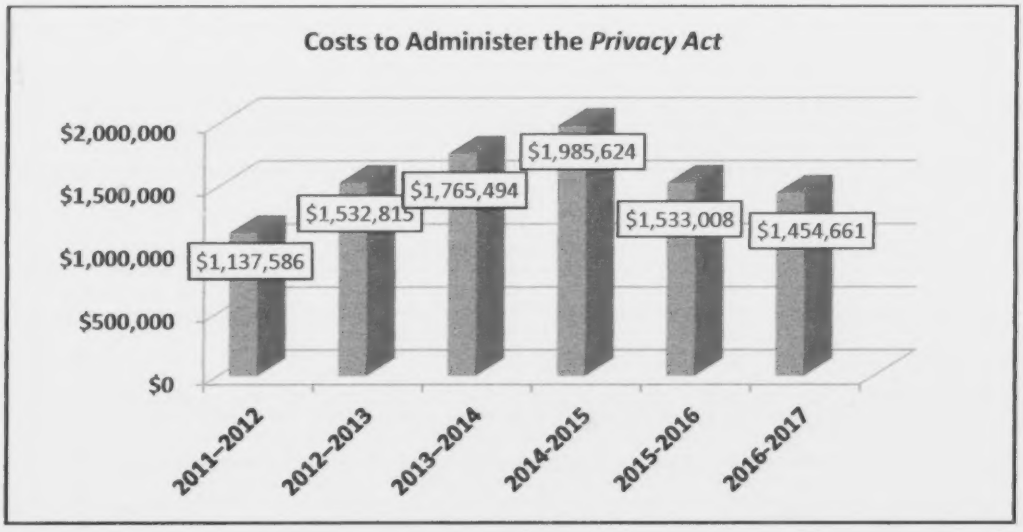
In 2016-2017, the VAC ATIP Office completed staffing processes to stabilize human resources. Given the relatively small size of the VAC ATIP Office, a number of FTEs are involved in both the administration of the *Access to Information Act* and the *Privacy Act*. Total FTEs in 2016-2017 were 28.4 compared to 25.14 FTEs in 2015-2016.[2]

The OVO ATIP Office had increased costs during the 2016-2017 fiscal year due to a higher volume of requests over the previous fiscal year and training provided to staff.

The VAC and OVO ATIP Offices spent a combined total of $1,454,661 to administer the *Privacy Act* during the reporting period. The breakdown is as follows:

(1) Staff salaries (including overtime) $1,388,127 (VAC $1,373,265 and OVO $14,862)
(2) Professional services contracts amounted to $1,000 (VAC $0 and OVO $1,000); and,
(3) Other administrative costs (representing operations and maintenance expenditures) $65,534 (VAC $65,534 and OVO $0).

[2] The VAC ATIP Office did not have any expenses for professional service contracts in 2016-2017.



7. Training and Awareness

Over the course of the year, departmental staff received access to information and privacy related training through a variety of mediums. ATIP training was delivered to 1,890 participants in 229 training sessions.

The following describes the training activities related to privacy with respective participant numbers and sessions for each:

Integrated Security / ATIP Training
942 Participants in 139 Sessions

VAC's mandatory Security Orientation Training, offered to all employees upon entering the organization and then at periodic intervals, highlights:

- Need-to-Know principle;
- Concept of privacy breaches;
- Rules regarding accessing information;
- Disciplinary actions resulting from accessing personal information without authorization; and
- Overview of ATIP legislation and fundamentals.

ATIP Awareness Sessions
222 Participants in 17 Sessions

ATIP Awareness sessions focus on ATIP principles and best practices. The sessions provide an overview of the *Access to Information Act* and the *Privacy Act;* the Duty to Assist, exemptions and exclusions; and, the roles and responsibilities related to privacy management.

National Orientation and Training Program
152 Participants in 5 Sessions

As new front line employees, including Case Managers and Client Service Agents, are hired at VAC they are required to participate in a comprehensive orientation and training program. The new employees have an opportunity to be trained for their respective positions in a consistent way. ATIP is a focus of the training and includes roles and responsibilities from an ATIP perspective, including but not limited to: what is personal information; privacy breaches; what to document, role in retrievals related to ATIP requests; and, collection, use and disclosure principles.

Privacy Impact Assessment Training
12 Participants in 1 Session

ATIP hosted privacy impact assessment (PIA) training to program subject matter experts who are involved in the writing of PIAs. The training included an overview of the *Privacy Act* Legislation, the Treasury Board Secretariat Directive on PIAs, as well as a review of the CORE template and risk identification process.

Effective Information Management
574 Participants in 68 Sessions

Effective Information Management sessions included training on how to manage information, the use of GCDOCS, and the value of good information management, including ease of access to information and privacy retrievals.

Office of the Veterans Ombudsman (OVO) – specific training

OVO staff took part in Departmental ATIP training, and three OVO staff members also attended in-depth training on the *Access to Information Act* and the *Privacy Act*.

8. Policies, Guidelines, Procedures and Initiatives

Subsection 8(2) of the *Privacy Act* provides limited and specific circumstances under which institutions may disclose personal information without an individual's consent. Paragraph 8(2)(m) allows institutions to release personal information if either the public interest in disclosure clearly outweighs any invasion of privacy that could result from disclosure, or if the

disclosure would clearly benefit the individual to whom the information relates. In 2016-2017, the VAC ATIP Office adopted objective criteria to apply to requests for information under paragraph 8(2)(m) of the *Privacy Act*. Additionally, the VAC ATIP Office developed a protocol for when personal information may be shared, with and without consent, taking into consideration social media. The ATIP Office continued to work with program areas and other Departments to ensure privacy principles were adhered to in relation to any information sharing required to support the delivery of Departmental programs and services. Additionally, the VAC ATIP Office developed a new approach to the development, approval and monitoring of Privacy Impact Assessments to ensure more timely completion and appropriate follow up in relation to privacy risks.

VAC and the OVO maintained and monitored current privacy policies, guidelines, and procedures during the 2016-2017 reporting period.

9. Summary of Key Issues and Actions Taken on Complaints and Audits

In the 2016-2017 reporting period, VAC received four complaints in relation to Privacy requests. Of the four complaints received by VAC, two were related to use and disclosure of personal information, one was related to collection and one was related to time limits.

VAC carried over 6 complaints from 2015-2016, for a total of 10 complaints requiring action in the 2016-2017 fiscal year. VAC made representation to the Office of the Privacy Commissioner on five of the 10 complaints, of which four were pursuant to Section 33. Three of the 10 complaints received a ruling from the Office of the Privacy Commissioner of Canada of not well founded during the reporting period. The remaining 7 complaints were carried forward to 2017-2018. VAC takes any findings from the Office of the Privacy Commissioner of Canada seriously and acts on the recommendations.

In the 2016-2017 reporting period, OVO received no complaints in relation to Privacy requests. No complaints were carried over from 2015-2016 and no complaints were carried forward to 2017-2018 for the OVO.

There were no appeals to the courts (for VAC or the OVO) during the 2016-2017 reporting period.

10. Monitoring Compliance

I Veterans Affairs Canada

Monitoring

There is a robust case management system in place for the VAC ATIP Office. Using reports produced by the ATIP case management software suite, the status of requests is reviewed by

the ATIP Office to monitor upcoming deadlines, allocate resources, and report on the status of open requests. More specifically, monitoring is done as follows:

- Weekly and monthly statistical performance reports to monitor overall departmental performance provided to Directorate, Divisional and senior management;
- Weekly operational meetings with staff to review work plans, establish priorities and reallocate resources as necessary;
- Enhanced case management using ATIP case management software, including weekly review and monitoring of the status of requests and consultation processes on access requests by the VAC ATIP Office Team Leaders, Managers and Director; and,
- Working closely with program areas throughout the Department, and holding a number of awareness and training sessions to support program areas in completing timely and quality retrievals.

Requests for Correction

VAC receives very few requests for correction of personal information each year. Time frames for responding to these requests are monitored by the VAC ATIP Office Team Leader, Manager and Director. Additionally, there is a close working relationship between the VAC ATIP Office and the program area responsible for the information during the correction process.

II Office of the Veterans Ombudsman

The OVO uses a tracking spreadsheet to monitor processing of requests for personal information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the Information Management Coordinator. Any anticipated issues with processing are escalated to the Director, Corporate Services and Charlottetown Operations.

Requests for Correction

The OVO has not received any requests for correction of personal information however, processes are in place to deal with any of these requests if they are received.

11. Material Privacy Breaches

I Veterans Affairs Canada

During the 2016-2017 fiscal year, 76 breaches impacting 3,424 individuals were confirmed by VAC. This is a 16% reduction in the total number of breaches compared to 2015-2016 (90 breaches) but an increase in number of individuals affected (114 individuals were affected in 2015-2016).

Of the 76 breaches reported in 2016-2017, there was one material breach. A material privacy breach involves sensitive personal information that could reasonably be expected to cause serious injury or harm to the individual and/or involves a large number of affected individuals. The one material breach of 2016-2017 occurred in December 2016 when a letter was sent from

the Department's health claims administrator to 3, 343 Veterans providing information on a new reimbursement policy concerning Cannabis for Medical Purposes. The subject line of the letter was viewable through the windowed envelope. Upon determining a material breach occurred, the VAC ATIP Office quickly reported the matter to the Office of the Privacy Commissioner and Treasury Board Secretariat. Veterans were notified of the material breach via a major news outlet.

VAC treats every breach as a serious matter. In accordance with the Treasury Board Secretariat *Directive on Privacy Practices* and the *Guidelines for Privacy Breaches,* VAC reports only material breaches to the Office of the Privacy Commissioner and the Treasury Board Secretariat. This is the practice to ensure VAC is consistent with other government institutions and Treasury Board Secretariat guidance. This change in reporting approach explains why the number of reported breaches reported to the Office of the Privacy Commissioner and Treasury Board Secretariat has decreased significantly in 2015-2016 and 2016-2017.

The VAC ATIP Office regularly provides awareness, training, advice and guidance on what constitutes a privacy breach and how to prevent breaches from occurring. This work complements the internal policies and procedures in place concerning breaches.

VAC staff are required to report privacy incidents as soon as possible. All incidents are investigated. When it is determined that a privacy breach has occurred, affected individual(s) are notified. Regular privacy breach updates are provided to Senior Management.

II Office of the Veterans Ombudsman

The OVO had no privacy breaches to report during the 2016-2017 reporting period.

12. Privacy Impact Assessment

In accordance with the Treasury Board Secretariat's *Directive on Privacy Impact Assessment*, the Department conducts PIAs on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and when services are contracted to another party. The purpose of a PIA is to ensure that privacy implications or risks are appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

During the 2016–2017 fiscal year, VAC submitted four new PIAs to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS) and provided addendums on 7 others for a total of 11. The following programs and activities were assessed during the fiscal year:

Funeral and Burial Program

VAC's Funeral and Burial Program (FBP) is administered by the Last Post Fund (LPF), a not-for-profit organization, on behalf of the Department. A Memorandum of Agreement (MOA) exists to ensure the roles and responsibilities of both parties are respected and outlines policy requirements that must be met by Veterans Affairs employees and other individuals conducting business on behalf of Veterans Affairs. As well, the MOA assists in ensuring appropriate safe-guarding of the client's personal information is a priority and addresses the protection, handling, retaining and the sharing of personal information as defined by the *Privacy Act*. The overarching objective of the FBP is to provide financial assistance so that eligible Veterans receive a dignified funeral and burial. Funeral and Burial Program - Privacy Impact Assessments (PIA) - Veterans Affairs Canada

Health Care Benefits and Services

In order to recognize their service to Canada, the Health Care Benefits and Services (HCBS) program provides clients, who meet the eligibility requirements, with access to appropriate treatment benefits related to their health needs. The HCBS provide financial support for a wide range of health-related products and services to treat both physical and mental health conditions. Financial support is available for specific benefits and services through the fourteen Programs of Choice (POC) - Aids for Daily Living, Ambulance/Medical Travel Services, Audio (Hearing) Services, Dental Services, Hospital Services, Medical Services, Medical Supplies, Nursing Services, Oxygen Therapy, Prescription Drugs, Prosthetics and Orthotics, Related Health Services, Special Equipment and Vision (Eye) Care.

The program is offered, in part, through a third party service provider Medavie Blue Cross (MBC). MBC processes payments for approved benefits and services through the Federal Health Claims Processing System (FHCPS). Payments are issued to either the service provider or the client, depending who submitted the claim. In certain programs, such as Dental and Pharmacy, claims and payments are issued on-line in real-time to service providers. The majority of the benefits and services available under the HCBS are listed on a benefit grid which offers guidance on benefits and services available, dollar limits, frequency limits, quantity limits, and approval requirements. Most VAC benefits and services have limits on the number of times a benefit can be covered in a specified period of time or how much VAC can pay toward a benefit or service. For many HCBS, a prescription from a qualified health care professional and pre-authorization from VAC is required. Health Care Benefits and Services (HCBS) - Veterans Affairs Canada

International Commemorative Activities

The Government of Canada, led by Veterans Affairs Canada, is commemorating significant milestones from the First and Second World Wars. Beginning in 2016, the commemoration activities include the 100th anniversary of the Battles of the Somme and Beaumont-Hamel in July 2016, the 100th anniversary of the Battle of Vimy Ridge in April 2017, the 75th anniversary of the Dieppe Raid in August 2017, and the 100th anniversary of the Battle of Passchendaele in November 2017. In response to changing security environments, certain governments are

seeking more identifying personal information than in the past, which led to the need to assess the privacy risks of such a request.
The Privacy Impact Assessment is comprised of two parts: a) privacy risks associated with the Beaumont-Hamel commemorative event in July 2016; and b) an addendum that includes a post-event analysis applicable to future international commemorative activities. At the conclusion of the July 2016 Beaumont-Hamel commemorative event, the approach towards the collection, disclosure and retention of the personal information was modified to reduce risks that were identified during the event for the continually evolving program delivery in a manner that balances security and the privacy rights of individuals. The additional risks and mitigation measures that were implemented are documented in a post-event analysis that forms an addendum to this Privacy Impact Assessment. International Commemorative Activities - Veterans Affairs Canada

Federal Health Claims Processing Service

VAC the Canadian Armed Forces (CAF) and the Royal Canadian Mounted Police (RCMP) provide a wide range of health benefits and services to eligible members/clients, Veterans and other persons, as specified under their respective legislation. VAC, RCMP and CAF have partnered to manage the claims processing and related services for these health benefits and services by using the Federal Health Claims Processing Service (FHCPS). This service is provided through a third party contract with Medavie Blue Cross (MBC) that was awarded in January 2014, followed by an 18 month development period. The operation phase began on August 1, 2015 and will run for an initial 7 year period. VAC is the project authority for the three partner Departments.

This Privacy Impact Assessment was completed in relation to the services provided by MBC on behalf of VAC. VAC has four programs that use FHCPS as part of its program delivery: Treatment Benefits, Veterans Independence Program, Intermediate and Long-Term Care and Rehabilitation Services and Vocational Assistance Program. FHCPS includes services and systems used to:

- Process VAC health claims;
- Support clients and providers with the processing and settlement of their claims; and,
- Ensure compliance with VAC policies and processes, including audit, reporting and financial control practices.

Federal Health Claims Processing Service (FHCPS) - Veterans Affairs Canada

PIA Addendums

Departmental Printing and Mailing Services

The Departmental Printing and Mailing service was initiated in October of 2012 to develop a system to enable the automation for the printing and mailing of correspondence (client facing forms and accompanying inserts) to Veterans, other clients and representatives of VAC. A Privacy Impact Assessment (PIA) for the Departmental Printing and Mailing service was initially completed in October of 2013 to assess the services delivered by Canada Post on behalf of VAC. Effective September 1, 2015, the printing and mailing service was transferred to another government institution and this service is now being delivered by Shared Services Canada (SSC) as accommodated through a Service Level Agreement. Departmental Printing and Mailing - Privacy Impact Assessment (PIA) - Veterans Affairs Canada

Operational Stress Injury (OSI) Clinic Network

The initial Privacy Impact Assessment on the Operational Stress Injury (OSI) Clinic Network was completed in 2015. All OSI clinics are established through Memoranda of Understandings (MOUs) with provincial health organizations. Veterans Affairs Canada (VAC) purchases mental health care services from these provincial organizations to ensure exclusive access for eligible OSI clients. It is noted that these provincial clinics are subject to their own legislative requirements.

In 2016, an addendum was completed to address changes since the original PIA was written. A new OSI clinic opened in June of 2015, and the former VAC-run clinics at Ste. Anne's Hospital were officially transferred from the Government of Canada to the Government of Quebec on April 1, 2016. The addendum assessed the risks associated with the transfer of personal information between VAC and the OSI Clinic Network. As well, an examination of the MOUs between VAC and the provincial health clinics was undertaken to assess privacy protection clauses to ensure privacy best practices are addressed and followed in support of the cross-jurisdictional transfer of personal information. Privacy Impact Assessment (PIA) - Operational Stress Injury (OSI) Clinic Network - Veterans Affairs Canada

Ste. Anne's Hospital Transfer Project

Since the introduction of the *Canada Health Act* and Medicare in the 1960s, the federal government began a process to transfer its 18 Veterans' hospitals to provinces, thereby respecting provincial jurisdiction in matters of heath care. Ste. Anne's Hospital (SAH) was the last remaining federally owned Veterans hospital and officially transferred to the Government of Quebec on April 1, 2016, becoming part of the new Centre intégré universitaire de santé et services sociaux (CIUSSS) de l'Ouest-de-l'Île-de-Montréal. The Ste. Anne's Hospital transfer agreement negotiated positions agreed upon between both levels of government in the transfer of the Hospital. Ste. Anne's Hospital will undergo the same provincial monitoring as other Quebec provincial long-term care facilities and will be subject to an accreditation process recognized by the province.

This Addendum further assessed the transfer of client files from VAC to the Government of Quebec to ensure the appropriate information would transfer with the hospital, and that hospital records were up to date and complete at the time of transfer. In addition, deceased and discharged patient paper records will not be transferred; however, they will be retained by VAC in accordance with the VAC approved retention period and, upon request, if discharged patients return to SAH post transfer, VAC will transfer the original patient record. Ste. Anne's Hospital Transfer Project - Veterans Affairs Canada

Service Health Records Digital Imaging Initiative (SHRDII) – Transition of Outside Documents Unit to Public Services and Procurement Canada (PSPC)

The initial PIA on the Service Health Records Digital Imaging Initiative (SHRDII) was completed in 2011. Since that time, changes related to VAC's transformation resulted in the transition of its Outside Documents Unit (OSD) to PWGSC (now known as Public Services and Procurement Canada (PSPC)) in Matane, Quebec, on June 28, 2013. The services now provided by PSPC for Service Health Records (SHRs) retrieved from LAC and/or the RCMP in response to VAC applications for programs/benefits/services were examined.

The assessment focussed on the transition of the provision of the services of the OSD to PSPC and included documenting the process for the retrieval of SHRs, the use and internal disclosure of these records and the final disposition. Service Health Records Digital Imaging - Veterans Affairs Canada

My VAC Account

The initial 2011 Privacy Impact Assessment (PIA) documented the risks and mitigation measures of implementing the My VAC Account (MVA). In 2013, the PIA was updated to assess the privacy impacts of the evolution of the portal.

Recently enhanced MVA functionality now allows for an electronic exchange of information between VAC and the Department of National Defense (DND). The electronic extraction of specified DND data elements will provide VAC with up-to-date, real-time service history and personal information about still-serving and recently released CAF members that is needed for the adjudication of benefits and services at VAC. The collection of service history and personal information from DND by VAC is not new but the electronic exchange of information between DND and VAC is a more efficient means of collecting only specific required data elements.

The focus of the 2017 PIA addendum is the automated exchange of information between VAC and the Department of National Defense (DND) through the MVA portal. My VAC Account - Veterans Affairs Canada

New Veterans Charter Disability Award, Death Benefit and Detention Benefit

This PIA Addendum was completed to address the following changes to the program since the original PIA was completed, including the changes as a result of changes provided in the *Budget Implementation Act, 2016.*

In October of 2011, payment options for the Disability Award were introduced. These options included lump sum, annual payments or a combination of these two.

In April of 2017, the amount of the Disability Award and Death Benefit will increase and an additional payment as provided for under the *Budget Implementation Act, 2016* (*BIA 2016*) will be implemented. This change represents a new use of information within the program. NVC Disability Award, Death Benefit and Detention Benefit - Veterans Affairs Canada

New Veterans Charter Financial Benefits Program

This PIA Addendum was completed following amendments to the program as a result of the *Budget Implementation Act, 2016*. These amendments included the following which came into effect October 1, 2016 and April 1, 2017 respectively:

Changes to the Earnings Loss Benefit (ELB), including increasing the monthly Earnings Loss Benefit from 75% to 90% of the recipient's gross pre-release military salary, setting the minimum pre-release salary to provide income support of at least $44,496.00 per year, and adjusting the calculation amount annually so that the Earnings Loss Benefit will keep pace with inflation.

Changes to the CIA program, including renaming the benefit to "Career Impact Allowance (CIA)" to better reflect the intent of the program and the introduction of a new assessment to be completed in some cases to determine career impact. NVC Financial Benefits Program - Veterans Affairs Canada

The OVO did not complete any PIAs during the 2016-2017 reporting period.

13. Public Interest Disclosures

Section 8 explains what constitutes a disclosure under paragraph 8(2)(m) of the *Privacy Act*. VAC had one disclosure of personal information pursuant to paragraph 8(2)(*m*)(i) of the *Privacy Act* during the 2016-2017 reporting period. The Office of the Privacy Commissioner of Canada was notified of the disclosure as required under subsection 8(5) of the *Privacy Act*. Notification was sent in writing to the OPC at the same time as to the requester.

OVO had no disclosures of personal information pursuant to paragraph 8(2)(*m*) of the *Privacy Act* during the 2016-2017 reporting period.

Annex 1: VAC and OVO Delegation Order – *Privacy Act* and Privacy Regulations

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X	X	X		
8(5)	Notice of disclosure under paragraph 8(2)(m)	X	X	X		
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X
17(3)(b)	Access in an alternative format	X	X	X	X	X

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
18(2)	Exempt banks	X	X	X	X	
19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	

Privacy Act **Provisions and associated descriptions**		**Column 1** Deputy Minister and Associate DM	**Column 2** All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	**Column 3** Privacy Coordinator within the Department of Veterans Affairs Canada	**Column 4** Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	**Column 5** Any analyst position within the Access to Information and Privacy (ATIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b), 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations **Provisions and associated descriptions**						
11(2),11 (4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

Position	***Privacy Act***	***Privacy Regulations***
Veterans Ombudsman	Full delegation	Full delegation
Director General of Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation

Minister of Veterans Affairs

March 16/16
Date

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Department of Veterans Affairs Canada

Reporting period: 2016-04-01 to 2017-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	743
Outstanding from previous reporting period	86
Total	829
Closed during reporting period	730
Carried over to next reporting period	99

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	32	114	21	16	3	2	0	188
Disclosed in part	9	223	63	62	30	11	2	400
All exempted	1	0	0	0	0	0	0	1
All excluded	0	0	0	0	0	0	0	0
No records exist	24	26	4	1	1	0	0	56
Request abandoned	44	20	8	4	2	3	0	81
Neither confirmed nor denied	0	3	1	0	0	0	0	4
Total	110	386	97	83	36	16	2	730

TBS/SCT 350-63 (Rev. 2014/03)

Canada

Part 2: Requests Closed During the Reporting Period

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	1	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	1	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	398
19(1)(f)	0	22.1	0	27	3
20	0	22.2	0	28	4
21	1	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	121	66	1
Disclosed in part	139	261	0
Total	260	327	1

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	9431	8017	188
Disclosed in part	173559	167437	400
All exempted	1	0	1
All excluded	0	0	0
Request abandoned	2231	2015	81
Neither confirmed nor denied	0	0	4
Total	185222	177469	674

Part 2: Requests Closed During the Reporting Period

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	167	2358	18	3974	2	310	1	1375	0	0
Disclosed in part	182	6090	101	22705	56	37276	61	101366	0	0
All exempted	1	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	76	5	4	664	0	0	1	1346	0	0
Neither confirmed nor denied	4	0	0	0	0	0	0	0	0	0
Total	430	8453	123	27343	58	37586	63	104087	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	3	8	0	0	11
Disclosed in part	36	7	0	1	44
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	2	5	0	0	7
Neither confirmed nor denied	0	0	0	0	0
Total	41	20	0	1	62

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
227	160	12	2	53

Part 2: Requests Closed During the Reporting Period

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	53	1	54
16 to 30 days	34	5	39
31 to 60 days	48	1	49
61 to 120 days	46	5	51
121 to 180 days	22	1	23
181 to 365 days	11	0	11
More than 365 days	0	0	0
Total	214	13	227

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
3	1	1	5

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	1
Requests for correction accepted	1
Total	2

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	1	0
Disclosed in part	0	0	15	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	16	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	16	0
Total	0	0	16	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	4	51	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	4	51	0	0
Closed during the reporting period	4	51	0	0
Pending at the end of the reporting period	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

	Number of Days Required to Complete Consultation Requests							
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	3	0	0	0	0	0	0	3
Disclosed in part	0	1	0	0	0	0	0	1
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	3	1	0	0	0	0	0	4

6.3 Recommendations and completion time for consultations received from other organizations

	Number of days required to complete consultation requests							
Recommendation	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Ddays	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
4	4	0	0	8

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	4

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		$1,371,916
Overtime		$16,211
Goods and Services		$66,534
• Professional services contracts	$1,000	
• Other	$65,534	
Total		**$1,454,661**

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	18.04
Part-time and casual employees	1.42
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.72
Total	20.18

Note: Enter values to two decimal places.

Annex 3: Statistical Report on the *Privacy Act* (OVO)

Government of Canada / Gouvernement du Canada

Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2016-04-01 to 2017-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	6
Outstanding from previous reporting period	0
Total	6
Closed during reporting period	6
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	1	3	0	0	0	0	0	4
Disclosed in part	1	1	0	0	0	0	0	2
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	2	4	0	0	0	0	0	6

Part 2: Requests Closed During the Reporting Period

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	1
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	28	0
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	4	0	0
Disclosed in part	2	0	0
Total	6	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	1048	549	4
Disclosed in part	196	165	2
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	1244	714	6

Part 2: Requests Closed During the Reporting Period

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	1	2	2	238	1	309	0	0	0	0
Disclosed in part	1	91	1	74	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	2	93	3	312	1	309	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	1	0	0	1
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	1	0	0	1

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

Part 2: Requests Closed During the Reporting Period

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	0	0
Closed during the reporting period	0	0	0	0
Pending at the end of the reporting period	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Ddays	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Pages Processed		101–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0

Part 10: Resources Related to the *Privacy Act*

10.1 Costs

Expenditures		Amount
Salaries		$14,862
Overtime		$0
Goods and Services		$1,000
• Professional services contracts	$1,000	
• Other	$0	
Total		**$15,862**

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.16
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.16

Annex 4: Five-Year Statistical Analysis (VAC and OVO)

	2012–2013	2013–2014	2014–2015	2015–2016	2016–2017	Variance 2016–2017 and 2015–2016
Requests received	391	654	663	763	743	-2.6%
Requests carried forward from prior year	173	292	179	81	86	+6.2%
Total requests requiring action	564	946	842	844	829	-1.8%
Completed requests	272	767	771	757	730	-3.6%
Requests carried forward to next year	292	179	71	87	99	+13.8%
Completed in 30 days or less	109	310	370	561	496	-11.6%
Exemptions invoked	116	411	508	408	409	+0.2%
Pages released	62667	228,010	256,953	198,889	177,469	-10.8%
***Privacy Act*—Total costs of administration**	$1,532,815	$1,765,494	$1,985,624	$1,533,008	$1,454,661	-5.1%
FTEs	20.46	22.65	24.14	18.18	20.18	+11.0%
Complaints received	48	14	2	4	4	-
Complaints ruled on	15	46	18	7	3	-57.1%
PIAs completed	8	9	1	12	4	-66.7%

Annex 5: Definitions of Dispositions

These definitions provide a brief explanation of the status of a completed request.

All disclosed:

All the records relevant to the request were disclosed to the applicant (i.e., without the application of any exemptions or exclusions).

All exempted:

No information was disclosed because all of the information requested qualified for exemption. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution.

All excluded:

No information was disclosed because all of the information requested qualified for exclusion. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Disclosed in part:

Only a portion of the information requested was disclosed because the remainder was exempt and/or excluded. For example, exemptions may be applied to personal information or information related to advice or recommendations developed by or for a government institution. Excluded information would include publicly available information or Confidences of the Queen's Privy Council. Excluded information is addressed in sections 68 and 69 of the *Access to Information Act*. The *Access to Information Act* does not apply to published material or material available for purchase by the public.

Does not exist:

The request provided sufficient information to identify the specific information sought but no relevant records were found.

Neither confirmed nor denied:

The Department could neither confirm nor deny the existence of any records pertaining to the request.

Request abandoned:

The request was abandoned either by the requester, or following a lack of response from the requester to a clarification letter.

Request transferred:

The request was transferred to another government department that was better suited to respond to the request.